

September 22, 2020

Joel Schneider, USMJ
United States District Court
District of New Jersey
1 John F. Gerry Plaza
4th and Cooper Streets
Camden, NJ 08101

RE: Response to Birchmeier letter (ECF 188) In Re: McBride v. Washington Township et al. 1:19-cv-17196

Dear Judge Schneider,

I am in receipt of Mr. Birchmeier's letter opposing my request to add to our status conference agenda items as to Defendant Washington Township. The goal of the status conference is to simplify this case by facilitating a settlement between Plaintiff and Defendant Carmen Saginario and Defendant Capehart and Scatchard. I would like to simplify matters as to Defendant Joseph Micucci and Defendant Washington Township as well. In that vein, I would ask the Court to hear me out, on the record, I have ideas to further simplify the case as to these two Defendants as well.

Opposing counsel for Defendant Washington Township has called this case "tortuous." While I am sorry to learn this case has Mr. Birchmeier's knickers in a wad, the fact remains his client already admitted liability, in writing, for the "twisted" acts Defendant Washington Township committed against Plaintiff. *The tortuous nature of the case is due to Defendant Washington Township trying to avoid the inevitable: Having to pay the Plaintiff for the damages Defendant already admitted to causing.*

Opposing counsel is an officer of this court. He has represented Defendant Washington Township before in *Martin v. Washington Township (Superior Court of New Jersey Docket GLO-L000997-17)*. In that case, Defendant Washington Township mishandled government records and discoverable evidence. Therefore, Opposing Counsel has a duty to honestly answer to this Court as to why Defendant Washington Township can't produce the discoverable evidence that is contemporaneously subject to the New Jersey Open Public Records Act.

This Court should be very disturbed by the pervasive repeated mishandling of evidence by Defendant Washington Township. In order to simplify this case, I am asking Your Honor to ask Mr. Birchmeier point blank and on the record: "Where are these documents and do you have unaltered copies in your custody and control?"

Sincerely yours,

Brian McBride

Plaintiff pro se